



*Testimony opposing HB 6814*  
*An Act Concerning the Establishment of a Coding System*  
*for the Designation of Recyclable and Compostable Products*  
**Environment Committee Public Hearing – Friday, March 10, 2023**

**To:** Honored Co-Chairs, Sen. Lopes and Rep. Gresko, and distinguished Members of the Environment Committee:

*The City of Middletown appreciates the opportunity to provide comments on HB 6814, An Act Concerning the Establishment of a Coding System for the Designation of Recyclable and Compostable Product.*

My name is Kim O'Rourke and I am the Recycling Coordinator for the City of Middletown. I have worked in this position for over thirty years and have extensive experience with municipal waste disposal, recycling, diversion and reduction programs. I am especially familiar with educating the public about recycling, waste reduction and diversion and composting.

Thank you for this well-intentioned bill. I believe it is trying to make it easier for the public to know what is accepted in the Connecticut recycling stream and then help manufacturers transition to more sustainable packaging. However, implementing such a system is extremely complicated. I don't see the benefit of placing the burden of designing, managing and funding this mandate on DEEP and a small non-profit when there is a proven system for addressing these problems with even greater results.

***Questions to be considered:***

- CT is a very small state. The manufacturer would have to "code" items just sold in CT. How would this effect the pricing of these products sold in our state?
- Ideally, systems will improve and more items will become acceptable in the recycling in the future. How difficult will it be to change the coding when improvements are made?
- What items would be coded for recycling: just the items mandated by the State? If so, that is very limited and is not inclusive of all the items on the Recycle Ct universal recycling list. Also, some sorting facilities use slightly different criteria. Black plastic is acceptable at one sorting facility, but not others. How would those discrepancies be coded?
- Some items may not be acceptable in curbside recycling, but are accepted at other locations (i.e. plastic film at retail). How would those be coded?
- This confusion also applies to compostable items, and that is even more complicated. In Middletown, we offer multiple drop offs for food waste, a restaurant food waste collection program and a pilot curbside food waste collection. We do not accept ANY "compostable" packaging in any of these programs. Adding those items to the stream would significantly increase the cost and are currently not acceptable at the receiving facility. Coding any packaging as "compostable" would only add to the confusion and contaminate our organics stream. Here's an [article](#) from *Popular Science* that offers some insight into some of the complexities of the "compostable" packaging concerns.

- Plastic packaging is not the only problem. Sometimes inaccurate messages are written on paper packaging. I have a Tom's toothpaste box that claims the tube inside is recyclable. It might help to forbid any product from being sold in CT if it is labeled with inaccurate CT recycling information. If it is not acceptable for recycling in CT and it says it is, then there should be repercussions. Yet, how would that be monitored and enforced?

All of this would be managed better under an EPR for packaging program. EPR would make the producers responsible for the recycling of their products. They are better equipped to control the packaging and the messaging. EPR would incentivize manufacturers to move to more sustainable packaging and require THEM to fund these changes. EPR for packaging will increase public education, improve recycling rates and encourage waste reduction, with a cost savings to municipal governments and no cost increase to consumers. It could assist with improvements to local infrastructure so there is a level playing field.

### ***Requirements for Recycle CT***

Recycle CT is a small non-profit organization, currently struggling to support its current grant programs. As a Board Member, I am concerned with these additional mandates without specific funding or adequate resources. I also disagree with the concept of requiring DEEP and Recycle CT to develop, fund and manage a grant program to assist manufacturers in transitioning to non-plastic packaging, especially, when there is a better, proven option to increase recycling and incentivize producers to design more sustainable packaging. Producers are much more capable of supporting these efforts and need to be included in the conversation and made responsible. That will organically lead to better labelling and more public education.

I appreciate the intent of this legislation. It is important to improve public education for recycling, however, I am concerned that this bill would be extremely complicated and difficult to execute and would not give us the intended end-result.

### ***How do I currently find recycling information?***

Recycling information should be provided to you by your hauler and your town or possibly a regional waste authority. Most CT cities and towns use the Recycle CT guidelines. All of Ct's sorting facilities should be complying with those guidelines, although there are starting to be discrepancies. The Recycle Ct guidelines accommodate the minimum guidelines. That information is available at [www.recyclect.com](http://www.recyclect.com) or through the RecycleCT Wizard app. Recycle CT and CT municipalities do not have the resources to adequately saturate the state with messaging, which is one reason why it is imperative producers are more involved through EPR to improve the messaging.

Thank you for your attention.

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